

January 5, 2008

Ms. Paula Connell  
Air Quality Permits Section, Industrial Division  
Minnesota Pollution Control Agency (MPCA)  
520 Lafayette Road North  
St. Paul, Minnesota 55155

**Subject: Midtown Eco-Energy Permit Application**

Dear Ms. Connell –

I am writing to let you know that I strongly oppose the approval of a permit for the Midtown Eco-Energy (MEE) biomass burner – especially without first completing an Environmental Assessment Worksheet (EAW).

Locating any sort of power plant that relies on incineration as a means to generate power in a crowded urban environment makes no sense. Time and again, waste burners have been shown to degrade air quality through their release of particulates and known toxins like mercury, dioxin, arsenic, lead, ammonia, sulfuric acid, and formaldehyde – up to 1,000,000 pounds of which are allowed to be discharged into the air by MEE's pending permit. Despite MEE's claim that they will burn "clean" wood in the form of urban tree trimmings and other similar wood waste, such wood still contains many of the poisons listed above (since urban trees filter and store it for us) and they will be freed into the air upon burning.

There is also concern that the metro area does not produce enough "clean" wood waste to meet the MEE burner's needs. Notably, the Green Institute cited this reason when it cancelled its plans to develop the MEE site. If that's the case, MEE will likely need to burn "unclean" wood waste, thus releasing even more harmful contaminants into the surrounding environment. While the currently pending permit does not allow for the use of refuse derived fuel (RDF), this permit can be revised in the future. Though the MEE group says that it intends to retain control of the burner for decades to come, we have no guarantee of that and a subsequent owner might not agree to the same standards of "cleanliness" that MEE has promised.

Another negative environmental impact of MEE's burner is the estimated two dozen or so semi-trailer truckloads of wood fuel that will need to enter & exit the facility daily. The emissions from these deliveries will create additional air pollution – as well as noise pollution and traffic flow interference. In addition to the power plant itself, such external factors as these must be considered when deciding how "clean" an energy source the plant truly is.

For these reasons and many others too numerous to list here, the MEE biomass burner is a bad idea. We citizens face enough threats to our health and well-being each day that are beyond human control – why spend our time, energy and money to create another one? I strongly urge the MPCA to deny MEE's permit.

Sincerely,

Ann Novitske  
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